



Illinois Environmental Protection Agency · 2200 Churchill Road, Springfield, IL 62706

(217)782-5544

EPA Region 5 Records Ctr.



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April 24, 1986

APR 24 1986

IEPA-DLPC

Mr. Basil G. Constantelos, Director
Waste Management Division
U.S. Environmental Protection Agency
Region V
230 South Dearborn Street
Chicago, Illinois 60604

Re: Request for Compliance Order
Granite City/Reilly Tar and Chemical Corp.
Madison County/LPC #1190400006
ILD #006278360
IEPA Enforcement #7918

Dear Mr. Constantelos:

This Agency hereby requests that a Compliance Order be issued against the above-referenced facility for violations of RCRA interim status regulations for hazardous waste management operations (35 Ill. Adm. Code 725 and 40 CFR 265). The enclosed memoranda and correspondence have been prepared by this Agency to support this enforcement action against Reilly Tar and Chemical Corp.

The violations existing at the facility include violations of Subpart H (Financial Requirements). Presently the facility is in violation of 35 Ill. Adm. Code 725.243 and 725.245 (40 CFR 265.143 and 265.145), which are the regulations requiring financial assurance for closure and post closure. The facility is also in violation of 35 Ill. Adm. Code 725.247 (40 CFR 265.147) because it has not shown that it has satisfied the liability requirements for sudden accidental occurrences.

As can be seen by the enclosures, Reilly Tar's Letter of Credit for facility closure was submitted to USEPA rather than to IEPA. Reilly Tar has been trying to resolve this problem with USEPA.

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The Illinois EPA notified Reilly Tar and Chemical of regulatory violations on at least three occasions. A Compliance Inquiry Letter (CIL) was sent on April 23, 1985, a Pre-Enforcement Conference Letter (PECL) was sent on August 30, 1985 and an Enforcement Notice Letter (ENL) was sent to the facility on February 18, 1986. Each of these letters notified Reilly Tar and Chemical of the violations existing at the facility.

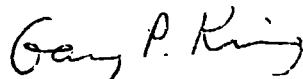
Although other regulatory violations existing at the facility have been resolved, the violations set forth above in this letter still exist.

Any questions relating to Reilly Tar's noncompliance with the Financial and Liability requirements may be directed to Mr. Andy Vollmer at 217/782-6762.

We also request that Paul Jagiello, Enforcement Attorney, be notified of the technical and legal staff assigned to this matter. We will update the enclosed materials with additional reports and correspondence as necessary. Please provide Paul Jagiello with copies of any Compliance Order issued in this case.

If you need further information or have any questions, please contact Paul Jagiello at 217/782-5544.

Very truly yours,



Gary P. King
Senior Attorney
Enforcement Programs

GK:mm

Enclosures

cc: Bill Miner (w/out att.)
Mary Gade (w/out att.)
Bill Muno (w/out att.)
Thomas Goltz (w/out att.)
Jody Traub (w/out att.)
Robert Kuykendall (w/out att.)
Bill Radlinski (w/out att.)
Ken Mensing (w/out att.)
Andy Vollmer (w/out att.)
DLPC Div. File (w/out att.)
Docket Control (w/out att.)
Mark Haney (w/out att.)

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LIST OF ATTACHMENTS

1. Closure Plan (8 pg.)
2. Reviewer's Notes dated July 30, 1984 (7 pg.)
3. Letter dated March 13, 1985 from Paul Springman to the Director of the Illinois EPA (1 pg.)
4. CIL dated April 23, 1985 (3 pg.)
5. Letter dated May 15, 1985 from R.E. McAdams to Illinois EPA with attachments (14 pg.)
6. Reviewer's Notes dated May 17, 1985 (1 pg.)
7. Reviewer's Notes dated June 6, 1985 (1 pg.)
8. Memo dated June 7, 1985 from Andy Vollmer to Compliance Section (1 pg.)
9. PECL dated August 30, 1985 (4 pg.)
10. Attendance Sheet for October 1, 1985 Pre-Enforcement Conference (1 pg.)
11. Letter dated October 4, 1985 from W. Justin to Michael Nechvatal (4 pg.)
12. Reviewer's Notes dated October 11, 1985 (1 pg.)
13. Letter dated October 15, 1985 from R.E. McAdam to Director of the Illinois EPA and attachments (14 pg.)
14. Reviewer's Notes not dated (1 pg.)
15. Letter dated November 7, 1985 from Mark Haney to William Justin (1 pg.)
16. ENL dated February 18, 1986 and attachments (5 pg.)
17. Letter dated February 20, 1986 from Paul Jagiello to William Justin (1 pg.)
18. Letter dated March 3, 1986 from W.A. Justin to Mark Haney (2 pg.)
19. Letter dated March 17, 1986 from Rolla McAdams (2 pg.)

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